

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternate Rates for Energy Programs and Budget (U 39 M).	Application 08-05-022 (Filed May 15, 2008)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009-2011.	Application 08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low- Income Assistance Programs and Budgets for Program Years 2009-2011.	Application 08-05-025 (Filed May 15, 2008)
Application of Southern California Edison Company (U 338-E) for Approval of Low- Income Assistance Programs and Budgets for Program Years 2009, 2010 and 2011.	Application 08-05-026 (Filed May 15, 2008)

**RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY
TO ASSIGNED COMMISSIONER'S RULING ORDERING LARGE
INVESTOR-OWNED UTILITIES TO COMPLY WITH PRIOR
COMMISSION/COMMISSIONER DIRECTIVES**

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July 1, 2008

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I. INTRODUCTION

In accordance with Rules of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure and the June 13, 2008 *Assigned Commissioner's Ruling Ordering Large Investor-Owned Utilities To Comply With Prior Commission/Commissioner Directives* ("Ruling"), San Diego Gas & Electric Company ("SDG&E") hereby submits these responses to questions regarding its Application for Approval of its Low-Income Assistance Programs and Budgets for Program Years 2009-2011 ("Application") filed on May 15, 2008. These responses are filed in compliance with the Ruling, in which Commissioner Grueneich directed the large investor owned utilities ("IOUs")¹

¹ The IOUs consist of SDG&E, Southern California Gas Company ("SoCalGas"), Southern California Edison ("SCE"), and Pacific Gas & Electric Company ("PG&E").

to provide more detailed information regarding their proposed applications. Below, SDG&E provides the requested information.

II. RESPONSES

1. Single Statewide Marketing Campaign.

SDG&E and the other IOUs have jointly developed a statewide marketing campaign for the Low Income Energy Efficiency (“LIEE”) program. The Statewide Marketing Plan, including proposed budget information along with all of the names and taglines that were considered, are attached below.



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Q1.doc

In compliance with the requirements of Decision (“D.”)07-12-051 and the April 1, 2008 Assigned Commissioner’s Ruling (“ACR”), which required the IOUs to develop a statewide LIEE tagline to use with our program names, SDG&E and the IOUs have selected and tested taglines and potential statewide LIEE program names.

To test low income customer responses to new names and taglines for the LIEE program, twenty focus groups were held in early June throughout the IOUs’ service territories. Focus groups, which were held in both English and Spanish, were conducted with customers who had previously participated in the LIEE program and customers who had never participated in (and may never have heard of) the LIEE program. A complete copy of the focus group report is attached below.



C:LIEE Tagline Name
Report 08-060-- 06-1

2. Integration and Leveraging

The following provides a high-level overview detailing current and proposed methods SDG&E uses or will use to integrate its internal demand side programs and leverage outside resources.

Done in the Past and Will Continue in 2009-2011	New Proposals for 2009-2011 (some will occur in 2008)
Coordination with local LIHEAP agencies – The only 2 LIHEAP contractors serving San Diego county are also LIHEAP service providers. SDG&E encourages these two LIEE/LIHEAP service providers to leverage both programs and expand available funding.	Partner with Metropolitan Water District
Promote LIEE program through the vast network of health and human services referral networks and CARE capitation contractors (e.g., 211, WIC agencies).	Partner with Cal-American Water and other local water agencies where feasible
SDG&E partners with various cities in its service territory by working with their representatives, local politicians, state elected officials and various community organizations to conduct targeted neighborhood events.	Develop partnerships with the San Diego Unified School District and the San Diego County Office of Education to leverage their programs aimed at low income families (free lunch, free bus passes, etc)
Leverage with Energy Efficiency programs where applicable (Lighting Turn In, Multi-Family, etc).	Expand leveraging opportunities with Energy Efficiency and Demand Response to include promotion of all EE and DR programs including - A/C Summer Saver Program, appliance rebates,
	Partner with additional agencies that: 1) provide assistance to low income customers and 2) have available funding to leverage projects and or measures.
	Expand coordination with local LIHEAP agencies.
	Incorporate LIEE Program into Energy Efficiency Third Party Contractor Programs
	Coordination with California Solar Initiative ("CSI") – Low Income Program

The following provides detail for all new SDG&E integration and leveraging proposals for program years 2009-2011.

- A. Metropolitan Water District ("MWD") – SDG&E has had discussions with MWD regarding collaborating to develop a strategic partnership to leverage program funds for the direct installation of high-efficiency clothes washers. MWD proposes to contribute \$110 towards the purchase cost of each high efficiency clothes washer that SDG&E's LIEE program installs. The balance of the purchase cost will be borne by the LIEE program. Many MWD member agencies have individual rebate budgets for high-

efficiency clothes washers and SDG&E and MWD plan to jointly approach these agencies to discuss the potential of leveraging funds.

B. California American Water (“Cal-Am”) and local water agencies – SDG&E has already initiated discussions with Cal-Am Water to leverage SDG&E’s CARE customer database as they begin to roll out their newly developed low income programs. SDG&E will work with Cal-Am and other local water agencies to promote and leverage CARE participation, energy efficiency and water conservation by setting up a referral system to provide additional benefits to the customer. The referral system will provide the following benefits:

- LIEE participants will be referred to their water provider for direct non-energy benefits of other available water efficient measures that LIEE does not offer (e.g. toilet replacements and other water measures).
- Promote the local water agency’s programs/rebates in an effort to jointly conserve water and energy while increasing awareness and reaching customers through new avenues and working relationships.
- Reciprocally, the water agencies will promote and refer its customers to CARE and LIEE for other water saving measures and energy saving measures not offered through the water agency.

C. San Diego Unified School District and San Diego County Office of Education – The San Diego Unified School District (“SDUSD”) serves more than 133,000 students and is the second largest school district in California and the 8th largest in the nation. The San Diego County Office of Education (“SDCOE”) provides to its member school districts quality services, effective and efficient use of resources, and innovative leadership by working collaboratively to meet the needs of students and expectations of the public. Both of these education entities serve a large number of low income families with various programs including a free lunch program and free bus pass program to name two. SDG&E, SDUSD and SDCOE will evaluate a number of creative ways to deliver information on the LIEE and other assistance programs into the hands of parents.

D. Leveraging with Energy Efficiency & Demand Response – expanded coordination with Energy Efficiency and Demand Response will include the following:

- Multi-family - SDG&E's LIEE will leverage with Energy Efficiency programs and activities to ensure that all possible efficiency opportunities within this sector are fully captured. The LIEE program excludes efficiency improvements within common areas, and also excludes tenants within a given complex that do not meet certain income guidelines. Coordination with EE will allow SDG&E to more effectively “cover” any” potential efficiency gaps and ensures greater program participation.
- Home Electronics - SDG&E's EE team intends to explore untapped savings opportunities through plug load efficiency. A recent EIA study of residential electricity end use estimated that electronic (plug load) products will account for 19% of the residential electricity consumption by 2020. The largest product contributor will be entertainment type equipment. The continued purchase of these high energy use products will eventually off-set the efficiency gains associated with other home products (refrigerators, dishwashers, etc). Therefore a statewide collaborative campaign will be undertaken in 2009-2011 to educate consumers about their purchases and to work closely with retailers and manufacturers to promote and stock consumer plug load products that use considerably less energy. The educational campaign will include development of informational collaterals and fact sheets. LIEE's collaboration will include providing this information in the customer's home assessment and energy audit and EE's collaterals at LIEE community outreach and events.
- Energy Efficiency (“EE”) and DR HVAC - For customers with existing central or room air conditioning units not eligible for replacements, due to outside approved climate zones and/or not LIEE eligible, SDG&E's LIEE team will work with the EE group to provide information about their EE air conditioning programs and services. The programs and services include HVAC tune-ups and annual bill credits for cycling their central air conditioner. Currently, SDG&E’s EE program is implemented through third party contractors.
- A/C Summer Saver Program - All LIEE customers with central; A/Cs are eligible to participate in the EE A/C Summer Saver Program which permits SDG&E to reduce the A/C by 1-3 degrees during critical peak load times and reward customers with a

bill credit incentive each December of \$25 each year of participation. SDG&E will work with its LIEE contractors to encourage these customers to enroll in the program.

- Appliances - All LIEE customers in need of appliances not provided in the Program will be referred to LIHEAP agencies if qualified or to SDG&E's EE groups for efficiency ratings and rebates information.
- Compact fluorescent lamp ("CFL") Recycling - SDG&E's LIEE team will work with the EE group to provide information about its CFL recycling program. Key elements include distribution of CFL disposal bags at all lighting turn-in exchanges and outreach events. In addition, the information will include a listing of various participating retail sites throughout San Diego County that LIEE participants can visit to properly dispose of CFL waste products." Energy Efficiency Technology and Tools" - SDG&E's LIEE will use technology and tools provided by the EE group including the Home Energy Consumption Tool ("HECH"), the In-Home Display unit ("IHD"), the HEES unit (Home Energy Equipment Services) to evaluate customer usage and potential savings during the home energy audit, and will provide customers the Shower Start to decrease water and energy usage. Additional information on these tools is discussed in the application.

E. Expand Coordination with LIHEAP Agencies - There are several potential opportunities for SDG&E to work with local LIHEAP agencies for better coordination with the LIEE program, which include:

- Implement a structured referral system to allow for flexibility between program participation where customers can be referred to the other party should a service or measure not be provided in one program.
- Track customer referral in the program database and measures installed by LIEE or LIHEAP.
- Provide those LIHEAP contractors in SDG&E's service territory access to SDG&E's LIEE database to enable them to pre-screen their clients to see if they have received LIEE services from SDG&E along with a list of the measures installed.

The large IOUs and DCSD have initiated discussions on how they and their respective contractors can work together to maximize the leveraging opportunities between the two programs:

F. Third Party Contractor Programs – SDG&E is exploring several opportunities to integrate its LIEE program with its general energy efficiency third party programs:

- LIEE plans to coordinate with energy efficiency third party contractor programs, such as the Mobile/Manufactured Home Innovative Outreach and Measure Program, where low-income customers residing in mobile/manufactured homes will be provided the opportunity to enroll in LIEE and other assistance programs. SDG&E will meet with the third party contractor to discuss and pursue integrating both programs and expect to have a partnership in place within the next four months.
- For the 2009-2011 SDG&E Energy Efficiency Third Party Contractor Programs, both EE and LIEE personnel will work closely together to determine which residential contractor programs could have LIEE integrated into the program. As third party contracts are negotiated in the following months, SDG&E will discuss with the EE-selected third parties (which will be submitted to the Commission in SDG&E 2009-2011 EE application on July 21, 2008), the third parties capacity and incremental budget requirements to incorporate LIEE outreach, education and services into their proposed EE program. Additionally, SDG&E will provide training and education to third party contractors who are not currently participating as LIEE contractors. This will ensure that LIEE customers are either offered or made aware of the portfolio of energy savings programs and services that are available to them and the benefits that can be achieved from program participation, i.e., energy savings, greenhouse gas reduction and other benefits.

G. Coordination with California Solar Initiative (“CSI”) – See response to Question 3 regarding how SDG&E proposes to coordinate its LIEE program with CSI.

H. BUDGET:

LIEE contributes for leveraging efforts with EE, Energy Programs Marketing and CARE. Budget dollars for leveraging business labor, marketing, collateral materials and customer promotional incentives are imbedded in the applicable categories of the 2009-2011 budget proposal. Past leveraging costs were also imbedded and included in actual expenditures reported in previous LIEE Annual Reports.

3. CSI

In the Ruling, the Commissioner acknowledges that SDG&E proposes to work with the CSI single-family and multi-family program administrators to coordinate efforts between CSI and LIEE programs and requests more details on the proposal. Though the details of implementing the coordination between the LIEE and CSI programs will have to be developed jointly by the CSI program administrators and the IOUs, SDG&E herein presents detail on the coordination of SDG&E's LIEE program with CSI.

The IOUs' efforts to coordinate the Commission's single family low income ("LI SF") and multifamily low income ("LI MF") CSI programs differ significantly pending a decision on the LI MF program. The most recent multifamily program, described in the Energy Division's Staff Proposal dated February 29, 2008, does not recommend LIEE measures be installed for the LI MF program, as has been directed by the Commission for the LI SF program. Instead, Staff's proposal recommends that applicants for LI MF solar undergo an energy audit and enroll in an IOU's energy-efficiency program(s) unless the building meets Title 24 standards. It further proposes that LI MF solar participants be required to provide information on the LIEE program to tenants. Therefore, SDG&E's suggestions for the LI MF program are being presented separately from its suggestions for the LI SF program which also is appropriate to having two different administrators for the programs. Additionally, the suggestions for the LI MF program are more tentative than those for LI SF given the uncertainty of the final program design.

Below are the actions SDG&E believes necessary to successfully coordinating its LIEE program with CSI.

LI SF and LIEE

- A. Provide information on LIEE customers to the Project Manager ("PM"). SDG&E proposes to provide to the PM information on customers who have received LIEE and who are homeowners. In order to accomplish the data exchange, SDG&E proposes that:
1. The PM, the Commission, and the IOUs agree to a date from which the customer data is to be provided and the frequency of updates on new LIEE enrollees.
- SDG&E recommends that LI SF program be provided with data on LIEE customers

who received all measures authorized under Rapid Deployment beginning in 2002 which is consistent with the IOUs determination of the number of customers eligible for LIEE as contained in the IOUs applications for 2009-2011;

2. The PM, the Commission, and the IOUs determine data elements and format;
3. The PM and SDG&E execute confidentiality agreement; and
4. SDG&E extract data from LIEE database and deliver to PM. SDG&E provide new enrollee information as often as agreed to with the Commission and PM.

B. Outreach CSI program. To outreach the CSI program, SDG&E proposes to modify LIEE outreach materials to include information to LIEE customers regarding their potential eligibility for CSI installations and CSI contact information. SDG&E also proposes to conduct a preliminary assessment of LIEE qualified homes to determine their feasibility for solar. As such, SDG&E proposes that the PM, the Commission and IOUs:

1. Agree to the specific information that will be provided to potential LIEE customers at the time of door-to-door canvassing;
2. Develop an assessment tool and process to be used by LIEE contractors which can preliminarily screen for the feasibility of photovoltaic installations and provide the PM with estimate of new LIEE customers' energy savings to be used in determining size of PV unit; and,
3. Agree to the particulars regarding the content and timing of additional outreach efforts, which can effectively and feasibly be expanded to include CSI LI SF message(s), e.g., direct mail pieces, collateral at community events, telemarketing scripts, e-mail blasts, CBO and other agency promotions, SDG&E website, brochures.

C. Provide LIEE measures and services to LI SF customers. To provide LIEE measures and services to LI SF customers, SDG&E proposes that the following steps be completed:

1. PM notifies SDG&E of any customers accepted into the LI SF program (CSI recipients), at what level of incentive they are enrolled, and an estimate of when photovoltaic system will be installed and operational;
2. SDG&E conducts measure assessment and enrolls the customer in LIEE if services have not been previously provided (since the end of 2001) and issues work orders for installations targeting a completion date prior to completion of CSI installation;
3. SDG&E initiates a review of the measures installed in previously served CSI recipients; home to ensure all feasible LIEE measures were available and installed and if not, initiates work orders for missing measures;
4. SDG&E provides an estimate of savings to be achieved through the LIEE program to PM so that correct sizing of photovoltaic unit can be completed;
5. SDG&E coordinates LIEE gas measure installations with SoCalGas in overlapping territories; and,
6. SDG&E notifies PM when LIEE work is completed.

D. Interconnect photovoltaic system to utility system and begin solar service. Although not part of coordination with LIEE, the interconnection of the photovoltaic system to the utility system should be coordinated between the PM, customer and electric utilities. To facilitate this process, SDG&E proposes that:

1. The PM notify SDG&E's Distributed Generation Programs that solar installation has been reserved for a home;
2. The customer of record completes and signs the interconnection application, and submits to SDG&E. See SDG&E website www.sdge.com/solar ;
3. The City of San Diego completes its inspection; and,
4. SDG&E completes an inspection to ensure the unit is in compliance with utility standards and then authorizes the customer to operate the system.

E. Issue incentive payments. SDG&E proposes to issue incentive payments to customers, when applicable. To issue incentive payments, SDG&E proposes the following steps:

1. The PM notices that photovoltaic installation is operational and the amount of the incentive to be paid; and

2. SDG&E issues payment to the customer and notifies PM that payment has been completed.

- F. Track information. Before tracking can be completed, SDG&E proposes that the Commission, the PM, and the IOUs determine what information will be retained by the PM and/or the IOUs for reporting purposes, e.g., LIEE services provided, cost of LIEE measures, PV system size and cost, incentives awarded.
- G. Recover incremental costs appropriately. SDG&E proposes that the recording and recovery of incremental costs incurred by SDG&E specific to the LI SF program should be agreed upon by the PM, Commission, and SDG&E. SDG&E proposes that recovery of incremental costs be achieved through SDG&E tracking costs specific to CSI program implementation (e.g., database cost, reporting, and issuing of incentive payments) and then billing the administrator.

LI MF and LIEE

- A. Provide information on LIEE to tenants of multi-family housing units. In order to provide information to tenants of multi-family housing units, SDG&E proposes that the program administrator (“PA”), the Commission and SDG&E:
1. Determine what information on LIEE is to be provided to tenants of LI MF applicants;
 2. Determine a process for enrolling those tenants at the facility who want to enroll; and,
 3. Develop an energy audit which includes recommendations for SDG&E’s general EE programs.
- B. Interconnect photovoltaic system to utility system and begin solar service. Although not part of coordination with LIEE, the interconnection of the photovoltaic system to the utility system should be coordinated between the PM, customer and electric utilities. To facilitate this process, SDG&E proposes that:
1. The PM notify SDG&E’s Distributed Generation Programs that solar installation has been reserved for a home;
 2. The customer of record complete and sign the interconnection application, and submit it to SDG&E. See SDG&E website www.sdge.com/solar;
 3. The City of San Diego complete its inspection; and,
 4. SDG&E completes its inspection and authorizes the customer to operate the system.

- C. Track information. Before tracking can be completed, SDG&E proposes that the Commission, the PM, and the IOUs determine that information to be retained by the PM and/or the IOUs for reporting purposes (e.g., LIEE services provided, cost of LIEE measures, PV system size and cost, incentive awarded).
- D. Recover incremental costs appropriately. SDG&E proposes that the recording and recovery of incremental costs incurred by SDG&E specific to the LI SF program should be agreed upon by the PM, Commission, and SDG&E. SDG&E proposes that recovery of incremental costs be achieved through SDG&E tracking costs specific to CSI program implementation (e.g., database cost, reporting, and issuing of incentive payments) and then billing the administrator.

4. Graphics Summarizing Applications

The requested color pie charts and graphs that summarize elements of SDG&E's Application are included in the attached excel document below.



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v4FINAL.xls

5. Water Conservation

In support of D.06-12-038, SDG&E has proposed two new measures in its program year 2009-2011 LIEE Application, which will provide significant energy and water savings. The following describes, in detail, the two proposed measures:

- High Efficiency Clothes Washer** - As the Commission acknowledged in D.07-12-050, “to use less water means using less energy.” With that statement in mind, SDG&E and the Metropolitan Water District (“MWD”) are in talks to develop a partnership to leverage available program funds for the direct installation of high-efficiency clothes washers. MWD proposes to contribute \$110 towards the purchase cost of each high efficiency clothes washer that SDG&E’s LIEE program installs. The balance of the purchase cost will be borne by the program. To ensure this proposed measure achieves maximum benefits for LIEE program energy savings, water reduction and customer bill savings, high efficiency clothes washers will only be made available to large households consisting of four or more household members, and when the clothes washer and clothes dryer in the household are operational. High efficiency clothes washers require less water be heated and extract more water from the clothes than traditional clothes washers. With the extraction of more water from the clothes, the required drying time is reduced, which also results in increased energy savings. The annual energy savings is expected to be approximately 37 therms and 49 kWh for natural gas dryers and 27 therms and 303 kWh if the dryer is electric, and water savings of 10,000 gallons.

	PY2009			PY2009			PY2009		
	Quantity	Water Savings (millions of gallons)	Budget (millions)	Quantity	Water Savings (millions of gallons)	Budget (millions)	Quantity	Water Savings (millions of gallons)	Budget (millions)
High Efficiency Clothes Washer	1,202	12.02	\$0.88	1,202	12.02	\$0.91	1,201	12.01	\$0.95

- Shower Start** - Due to the way in which homes are plumbed, many customers turn on their shower and perform other tasks while waiting for the water to reach the desired

temperature. This practice results in a waste of both energy and water. The Shower Start allows customers to start the flow of hot water and when the water reaches a certain temperature reduces the flow of water to a trickle. When customers enter the shower, they release the valve and adjust the water temperature. This measure will save customers both energy and water. The estimated energy savings for this measure averages approximately 13.6 therms when water is heated with natural gas and 399kWh when the water heater is electric and 2,500 gallons of water per year per home.

	PY2009			PY2009			PY2009		
	Quantity	Water Savings (millions of gallons)	Budget (millions)	Quantity	Water Savings (millions of gallons)	Budget (millions)	Quantity	Water Savings (millions of gallons)	Budget (millions)
Shower Start	10,000	25	\$0.47	10,000	25	\$0.48	10,000	25	\$0.50

Proposed Partnership with Local Water Agencies

SDG&E also intends to partner with local water agencies to promote and leverage CARE, EE and water conservation by setting up a referral system to provide additional benefits to customers. The referral system will provide the following benefits:

- Refer LIEE participants to local water agencies for direct non-energy benefits of other available water efficient measures that LIEE does not offer (e.g. toilet replacements or other water measures).
- Promote the local water authority's programs/rebates in an effort to conserve water and energy, while increasing awareness and reaching customers through new avenues and working relationships.
- Promote and refer water authority customers to SDG&E's CARE and LIEE programs for other water saving measures and energy saving measures not offered through the water authority.

SDG&E also proposes to develop effective and mutually beneficial leveraging opportunities with California American Water Company ("Cal-Am"), which provides water service to Coronado, Imperial Beach and portions of the City of San Diego. There is potential

for data sharing between the utilities to increase benefits to San Diego's low income community by facilitating enrollments in both utilities' programs.

SDG&E does not have a specific dollar amount budgeted for this activity because the dollars for this activity are imbedded in various administrative cost categories of the 2009-2011 budget proposal

Existing LIEE Program Water Conservation Measures

SDG&E's LIEE program will continue to provide water heater replacement and water conservation measures (e.g., water heater blanket, low-flow showerhead, pipe wrap, faucet aerator) in program years 2009, 2010 and 2011. SDG&E plans to install nearly 10,000 water heater conservation measures in 2008 and proposes to increase this amount to 20,000 annually in program years 2009, 2010, and 2011.

In addition, when providing energy education, SDG&E LIEE personnel will distribute the fact sheet *HELPING THE ENVIRONMENT THROUGH ENERGY EFFICIENCY*, which includes several water conservation recommendations. The LIEE program will also work with San Diego County Water Authority to distribute additional SDCWA water conservation information. The estimated printing costs are still to be determined.

6. Education

As directed in D.06-12-038, and in an effort to reduce greenhouse gases and promote water conservation, SDG&E developed an energy education fact sheet that discusses the benefits of general EE programs. The fact sheet was developed in coordination with SoCalGas.

The title of the SDG&E's energy education fact sheet is "Helping the Environment through Energy Efficiency". This fact sheet is used as a guide to inform customers about simple tips that customers can use to save money through reduced energy and water usage, and discusses the benefits of reduced carbon dioxide emissions. In addition, the fact sheet serves as a guide to facilitate discussions regarding how customers can contribute to reduce greenhouse gases, through participation in the LIEE program, and how their participation can assist California in meeting its emission reduction goals by the year 2020. The fact sheet has been incorporated as part of the in-home energy education component of the program and is discussed with the customer by a trained outreach specialist. It is also distributed at various outreach events and lighting turn-in events.

SDG&E initially printed 20,000 fact sheets, and will continue to print and distribute this piece on an on-going basis. A copy of this fact sheet is attached below.



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CA-LIEE_EnvFS FINA

III. CONCLUSION

SDG&E appreciates this opportunity to provide further detail and clarity regarding its Application and looks forward to working with the Commission and other interested parties in this proceeding.

July 1, 2008

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that pursuant to Commission's Rules of Practice and Procedure, I have this day served a true and correct copy of **RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY TO ASSIGNED COMMISSIONER'S RULING ORDERING LARGE INVESTOR-OWNED UTILITIES TO COMPLY WITH PRIOR COMMISSION / COMMISSIONER DIRECTIVES** to each party of record on the service list in A.08-05-022, A.08-05-024, A.08-05-025, A.08-05-026, and R.07-01-042 via electronic mail. Those parties without an email address were served by placing copies in properly addressed and sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Executed this 1st day of July, 2008 at San Diego, California.

/s/ Kim Hassan

Kim Hassan



California Public
Utilities Commission

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